

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2023 APR 12 PM 1:40
OFFICE OF THE CLERK

CRABAR/GBF, INC.,

Plaintiff and
counterclaim
defendant,

vs.

MARK WRIGHT and WRIGHT
PRINTING CO.,

Defendants and
counterclaimants,

and

MARDRA SIKORA, JAMIE
FREDRICKSON, and ALEXANDRA
KOHLHAAS,

Defendants.

8:16-CV-537

VERDICT FORM

WRIGHT PRINTING COMPANY

Breach of Contract

Question 1: On Crabar's breach of contract claim against defendant Wright Printing, as instructed in Instruction #11, we find in favor of:

 X Crabar
 Wright Printing

(Mark an "X" in the appropriate space)

Answer Question 2 only if you find in favor of Crabar in Question 1. If you found in favor of Wright Printing, you have completed your deliberation for this claim and may proceed to the next claim.

Question 2: What is the total amount of damages, if any, that will fairly and reasonably compensate Crabar for its injuries caused by Wright Printing's breach of contract?

 \$ 500,000.00

Trade Secrets

Question 3: On Crabar's misappropriation of trade secrets claim against defendant Wright Printing, as instructed in Instruction #12, we find in favor of:

 X Crabar
 Wright Printing

(Mark an "X" in the appropriate space)

Answer Questions 4, 5, and 6 only if you find in favor of Crabar in Question 3. If you found in favor of Wright Printing, you have completed your deliberation for this claim and may proceed to the next claim.

Question 4: What is the amount of damages that will fairly and reasonably compensate Crabar for its injuries caused by Wright Printing's misappropriation of trade secrets?

 \$ 250,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for Wright Printing's misappropriation of trade secrets (Question 4), you must determine whether any of those damages are for the same injury. If so, answer Question 5. If not, write a "0" on the line below and proceed to Question 6.

Question 5: By what amount should your answer to Question 4 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

Question 6: What is the amount of exemplary damages, *if any*, for any trade secrets which Wright Printing willfully and maliciously misappropriated?

\$ 0

Tortious Interference

Question 7: On Crabar's tortious interference claim against defendant Wright Printing, as instructed in Instruction #13, we find in favor of:

Crabar
 Wright Printing

(Mark an "X" in the appropriate space)

Answer Questions 8 and 9 only if you find in favor of Crabar in Question 7. If you found in favor of Wright Printing, you have completed your deliberation for this defendant and may proceed to the next defendant.

Question 8: What is the total amount of damages, if any, that will fairly and reasonably compensate Crabar for its injuries caused by Wright Printing's tortious interference?

\$ 250,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for Wright Printing's tortious interference (Question 8), you must determine whether any of those damages are for the same injury. If so, answer Question 9. If not, you have completed your deliberation for this defendant. Write a "0" on the line below and proceed to the next defendant.

Question 9: By what amount should your answer to Question 8 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

MARK WRIGHT

Breach of Contract

Question 1: On Crabar's breach of contract claim against defendant Mark Wright, as instructed in Instruction #11, we find in favor of:

 X Crabar
 Mark Wright

(Mark an "X" in the appropriate space)

Answer Questions 2 and 3 only if you find in favor of Crabar in Question 1. If you found in favor of Mark Wright, you have completed your deliberation for this claim and may proceed to the next claim.

Question 2: What is the total amount of damages, if any, that will fairly and reasonably compensate Crabar for its injuries caused by Mark Wright's breach of contract?

\$ 1,000,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for Mark Wright's breach of contract (Question 2), you must determine whether any of those damages are for the same injury. If so, answer Question 3. If not, write a "0" on the line below and proceed to the next claim.

Question 3: By what amount should your answer to Question 2 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

Trade Secrets

Question 4: On Crabar's misappropriation of trade secrets claim against defendant Mark Wright, as instructed in Instruction #12, we find in favor of:

X Crabar
_____ Mark Wright

(Mark an "X" in the appropriate space)

Answer Questions 5, 6, and 7 only if you find in favor of Crabar in Question 4. If you found in favor of Mark Wright, you have completed your deliberation for this claim and may proceed to the next claim.

Question 5: What is the amount of damages that will fairly and reasonably compensate Crabar for its injuries caused by Mark Wright's misappropriation of trade secrets?

\$ 500,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for Mark Wright's misappropriation of trade secrets (Question 5), you must determine whether any of those damages are for the same injury. If so, answer Question 6. If not, write a "0" on the line below and proceed to Question 7.

Question 6: By what amount should your answer to Question 5 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

Question 7: What is the amount of exemplary damages, *if any*, for any trade secrets which Mark Wright willfully and maliciously misappropriated?

\$ 1,000,000.00

Tortious Interference

Question 8: On Crabar's tortious interference claim against defendant Mark Wright, as instructed in Instruction #13, we find in favor of:

Crabar
 Mark Wright

(Mark an "X" in the appropriate space)

Answer Questions 9 and 10 only if you find in favor of Crabar in Question 8. If you found in favor of Mark Wright, you have completed your deliberation for this defendant and may proceed to the next defendant.

Question 9: What is the total amount of damages, if any, that will fairly and reasonably compensate Crabar for its injuries caused by Mark Wright's tortious interference?

\$ 250,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for an injury in Question 9, you must determine whether any of those damages are for the same injury. If so, answer Question 10. If not, you have completed your deliberation for this defendant. Write a "0" on the line below and proceed to the next defendant.

Question 10: By what amount should your answer to Question 9 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

MARDRA SIKORA

Trade Secrets

Question 1: On Crabar's misappropriation of trade secrets claim against defendant Mardra Sikora, as instructed in Instruction #12, we find in favor of:

 X Crabar
 Mardra Sikora

(Mark an "X" in the appropriate space)

Answer Questions 2, 3, and 4 only if you find in favor of Crabar in Question 1. If you found in favor of Mardra Sikora, you have completed your deliberation for this claim and may proceed to the next claim.

Question 2: What is the amount of damages that will fairly and reasonably compensate Crabar for its injuries caused by Mardra Sikora's misappropriation of trade secrets?

\$ 250,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for Mardra Sikora's misappropriation of trade secrets (Question 2), you must determine whether any of those damages are for the same injury. If so, answer Question 3. If not, write a "0" on the line below and proceed to Question 4.

Question 3: By what amount should your answer to Question 2 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

Question 4: What is the amount of exemplary damages, *if any*, for any trade secrets which Mardra Sikora willfully and maliciously misappropriated?

\$ 250,000.00

Tortious Interference

Question 5: On Crabar's tortious interference claim against defendant Mardra Sikora, as instructed in Instruction #13, we find in favor of:

X Crabar
_____ Mardra Sikora

(Mark an "X" in the appropriate space)

Answer Questions 6 and 7 only if you find in favor of Crabar in Question 5. If you found in favor of Mardra Sikora, you have completed your deliberation for this defendant and may proceed to the next defendant.

Question 6: What is the total amount of damages, if any, that will fairly and reasonably compensate Crabar for its injuries caused by Mardra Sikora's tortious interference?

\$750,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for an injury caused by Mardra Sikora (Question 6) and for any injury caused by another defendant, you must determine whether any of those damages are for the same injury. If so, answer Question 7. If not, you have completed your deliberation for this defendant. Write a "0" on the line below and proceed to the next defendant.

Question 7: By what amount should your answer to Question 6 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

JAMIE FREDRICKSON

Trade Secrets

Question 1: On Crabar's misappropriation of trade secrets claim defendant Jamie Fredrickson, as instructed in Instruction #12, we find in favor of:

 X Crabar
 Jamie Fredrickson

(Mark an "X" in the appropriate space)

Answer Questions 2, 3, and 4 only if you find in favor of Crabar in Question 1. If you found in favor of Jamie Fredrickson, you have completed your deliberation for this claim and may proceed to the next claim.

Question 2: What is the amount of damages that will fairly and reasonably compensate Crabar for its injuries caused by Jamie Fredrickson's misappropriation of trade secrets?

\$ 0

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for Jamie Fredrickson's misappropriation of trade secrets (Question 2), you must determine whether any of those damages are for the same injury. If so, answer Question 3. If not, write a "0" on the line below and proceed to Question 4.

Question 3: By what amount should your answer to Question 2 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

Question 4: What is the amount of exemplary damages, *if any*, for any trade secrets which Jamie Fredrickson willfully and maliciously misappropriated?

\$ 5,000.00

Breach of Contract

Question 5: On Crabar's breach of contract claim against defendant Jamie Fredrickson, as instructed in Instruction #15, we find in favor of:

X Crabar
_____ Jamie Fredrickson

(Mark an "X" in the appropriate space)

Answer Questions 6 and 7 only if you find in favor of Crabar in Question 5. If you found in favor of Jamie Fredrickson, you have completed your deliberation for this claim and may proceed to the next claim.

Question 6: What is the total amount of damages, if any, that will fairly and reasonably compensate Crabar for its injuries caused by Jamie Fredrickson's breach of contract?

\$ 1,000.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for an injury caused by Jamie Fredrickson (Question 6) and for any injury caused by another defendant, you must determine whether any of those damages are for the same injury. If so, answer Question 7. If not, you have completed your deliberation for this defendant. Write a "0" on the line below and proceed to the next defendant.

Question 7: By what amount should your answer to Question 6 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

ALEXANDRA KOHLHAAS

Trade Secrets

Question 1: On Crabar's misappropriation of trade secrets claim against defendant Alexandra Kohlhaas, as instructed in Instruction #12, we find in favor of:

X Crabar
 Alexandra Kohlhaas

(Mark an "X" in the appropriate space)

Answer Questions 2, 3, and 4 only if you find in favor of Crabar in Question 1. If you found in favor of Alexandra Kohlhaas, you have completed your deliberation for this claim and may proceed to the next claim.

Question 2: What is the amount of damages that will fairly and reasonably compensate Crabar for its injuries caused by Alexandra Kohlhaas's misappropriation of trade secrets?

\$ 0

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for another injury and for Alexandra Kohlhaas's misappropriation of trade secrets (Question 2), you must determine whether any of those damages are for the same injury. If so, answer Question 3. If not, write a "0" on the line below and proceed to Question 4.

Question 3: By what amount should your answer to Question 2 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

Question 4: What is the amount of exemplary damages, *if any*, for any trade secrets which Alexandra Kohlhaas willfully and maliciously misappropriated?

\$ 2,500,00

Breach of Contract

Question 5: On Crabar's breach of contract claim against defendant Alexandra Kohlhaas, as instructed in Instruction #15, we find in favor of:

X Crabar
_____ Alexandra Kohlhaas

(Mark an "X" in the appropriate space)

Answer Questions 6 and 7 only if you find in favor of Crabar in Question 5. If you found in favor of Alexandra Kohlhaas, you have completed your deliberation for this defendant and may proceed to the next page.

Question 6: What is the total amount of damages, if any, that will fairly and reasonably compensate Crabar for its injuries caused by Alexandra Kohlhaas's breach of contract?

\$ 500.00

As explained in Instruction #17, Crabar may only be compensated once for any injuries it has proven. If you awarded damages for an injury caused by Alexandra Kohlhaas (Question 6) and for any other injury, you must determine whether any of those damages are for the same injury. If so, answer Question 7. If not, you have completed your deliberation for this defendant. Write a "0" on the line below and proceed to the next page.

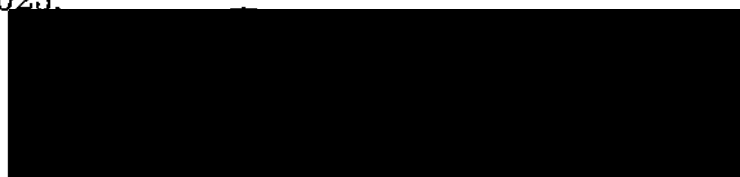
Question 7: By what amount should your answer to Question 6 be reduced to prevent Crabar from recovering more than once for the same injury?

\$ 0

EXECUTION OF VERDICT FORM

The foreperson shall sign and date the verdict form, and such signature shall mean that the verdict of the jury was unanimous.

Dated this 12th day of April, 2023.



FOREPERSON